

EMERY CELLI BRINCKERHOFF ABADY WARD & MAAZEL LLP

JONATHAN S. ABADY
MATTHEW D. BRINCKERHOFF
ANDREW G. CELLI, JR.
RICHARD D. EMERY
DEBRA L. GREENBERGER
DIANE L. HOUK
DANIEL J. KORNSTEIN
JULIA P. KUAN
HAL R. LIEBERMAN
ILANN M. MAAZEL
KATHERINE ROSENFELD
ZOE SALZMAN
SAM SHAPIRO
EARL S. WARD
O. ANDREW F. WILSON

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbawm.com

VASUDHA TALLA

ERIC ABRAMS
NICK BOURLAND
HANNAH BRUDNEY
DANIEL M. EISENBERG
ARIADNE M. ELLSWORTH
SARA LUZ ESTELA
BIANCA HERLITZ-FERGUSON
LAURA S. KOKOTAILO
SONYA LEVITOVA
HAFSA S. MANSOOR
SANA MAYAT
VIVAKE PRASAD
MAX SELVER
EMILY K. WANGER
RACHAEL WYANT
SYDNEY ZAZZARO

January 10, 2024

Via ECF

Hon. Joseph A. Marutollo
United States District Court
Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Beiner v. Moreno et al.*, Index No. 24-Civ-08600

Dear Judge Marutollo:

This firm represents Plaintiff Nichole Beiner in the above-referenced matter. We write to notify the Court that Defendants have consented to Plaintiff's request to file an unredacted version of her complaint on the public docket. ECF No. 13.

Plaintiff initially filed her complaint with redactions and a motion asking the Court to allow her to file an unredacted complaint on the public docket. ECF Nos. 1, 3. On December 23, 2024, Your Honor denied Plaintiff's motion to seal without prejudice and instructed Plaintiff to refile her motion after Defendants filed appearances.

After Plaintiff served the summons and complaint on Defendants, they consented to Plaintiff filing an unredacted version, which we have now done. ECF No. 13.

Respectfully submitted,

/s/
Hal R. Lieberman
Zoe Salzman
Sydney Zazzaro